Document 14

Document 13

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Defendants VeriSign, Inc. and m-Qube, Inc. (collectively "Defendants") and plaintiff Babak Pishvaee ("Plaintiff"), through their respective counsel of record, pursuant to Local Rule 6-1, hereby stipulate and agree as follows based on the following facts:

- (1) On June 28, 2007, Plaintiff served Defendants with the original complaint in this action.
- (2) On June 28, 2007, this Court issued its Order Setting Initial Case Management Conference and ADR Deadlines. The deadlines set forth in that Order are detailed in paragraph 4 below. [Docket No. 2].
- On August 24, 2007, during a meet and confer session to discuss the issues raised in Defendants' intended motions to dismiss the original complaint, the parties reached the following agreements: (1) Defendants will not be required to respond to the original complaint, as Plaintiff will be filing a first amended complaint; (2) Plaintiff shall file a first amended complaint no later than September 21, 2007; and (3) Defendants shall file their respective responsive pleadings to the first amended complaint no later than November 20, 2007. On August 24, 2007, the parties filed with the Court a joint stipulation reflecting the above agreements. [Docket No. 12].
- (4) Given Plaintiff's intention to amend her complaint, and Defendants' revised responsive pleading deadline, the parties have agreed to continue the Case Management Conference and ADR deadlines as follows:

EVENT	ORIGINAL DEADLINE	REVISED DEADLINE
Last day to meet and confer re:	9/11/2007	1/22/2008
initial disclosures, early		
settlement, ADR process		
selection and discovery plan		
Last day to file Joint ADR	9/11/2007	1/22/2008
Certification with Stipulation to		
ADR Process or Notice of		
Need for ADR Phone		

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